

what this upgrade actually requires. In fact, the vast majority of changes between NANC releases 1.1 and 1.8 involve documentation, not coding changes.

There are only two coding changes which BellSouth must make in order to upgrade from NANC version 1.1 to 1.8: "port to original" and "NPA splits." The "port to original" function supports the ability to return a number to the original code holder in the Local Exchange Routing Guide ("LERG") -- it is essentially a means to "cancel" porting and return to 6-digit routing for a particular number. The "NPA splits" capability permits updating of the NPA (area code) for all ported numbers in the event of an NPA split.

BellSouth's petition nowhere explains why it requires 35 weeks to implement the two coding changes described above. Further, the petition does not even attempt to explain why BellSouth has not already implemented these changes. The Minutes of the November 13-14, 1997 meeting of the NANC Technical and Operational Requirements Task Force, attached to this pleading as Exhibit 1, indicate that the Port to Original and NPA Split functions were planned for introduction by Lockheed in December 1997, and by Perot Systems in the first quarter of 1998. The minutes also plainly show that a BellSouth representative attended the meeting. Thus, BellSouth knew no later than mid-November of last year that it needed to perform these upgrades, and gave no indication at that time that it believed they would require 35 weeks to implement. Indeed, there appears to be no reason that BellSouth could not upgrade its systems to NANC specification 1.8 prior to the May 11, 1998 NPAC/SMS "live" date.

Based on this evidence, and on the fact that no other carrier has indicated that it needs any additional time -- much less two-thirds of a year -- to upgrade to NANC specification 1.8, it may be that BellSouth has PLNP systems problems that are not related

to the NPAC/SMS delay in its region -- and which it has not offered as a basis for its waiver request. In all events, based on BellSouth's representation that the only tasks it must perform in order to implement PLNP for Phase I are those required to upgrade its NPAC/SMS interface from NANC specification 1.1 to specification 1.8, the Commission should reject BellSouth's request to extend Phase I implementation into mid-November 1998.

To the extent the Commission even considers BellSouth's petition, it should require that carrier to clearly and completely explain what tasks it contends must be completed before it can implement PLNP. BellSouth's petition also is silent as to what alternatives and workarounds, if any, it has considered that might permit it to support PLNP on an interim basis, stating only that it has "investigated whether there are expeditious avenues for delivering" PLNP, without specifying what investigations it actually conducted.¹⁹ The Commission should order BellSouth to rectify these omissions before even considering granting any relief of the PLNP deadlines that extends beyond the dates AT&T proposes in its petition. In addition, BellSouth simply states as a *fait accompli* that it will need 35 weeks to prepare its systems for PLNP, without describing whether -- or if -- it has assigned additional personnel to these tasks, authorized overtime or extra shifts, or taken other steps to ensure that its PLNP deployment gets back on track as soon as possible. AT&T urges the Commission to require, as an element of any waiver, that

¹⁹ BellSouth, p. 15; McDougal Affidavit, ¶ 7.

BellSouth prepare an aggressive implementation plan and file weekly, publicly available reports documenting its progress in executing it.

C. BellSouth Can Complete Implementation Two Weeks Following Testing

Even putting aside BellSouth's unsupported claim that it will require 35 weeks to upgrade to NANC specification 1.8, its petition seeks to extend PLNP deployment far longer than is reasonable. BellSouth alleges that it will be prepared to begin intercompany testing (also known as "end-to-end testing") on September 1, 1998. Its petition agrees with the estimates of other carriers by proposing that intercompany testing will take 30 days.²⁰ BellSouth proposes to begin Phase I PLNP implementation on the day following testing, and to complete it on November 14, 1998.

The petition's proposal to spend more than six weeks gradually rolling out PLNP should be rejected outright.²¹ Two weeks following inter-company testing should be ample time for carriers to implement PLNP in Phase I MSAs. Accordingly, unless BellSouth elects to seek a waiver because of problems unrelated to the NPAC/SMS delay (as it has not yet done), that carrier should be prepared to complete intercompany testing on

²⁰ BellSouth, p. 14 (stating that BellSouth will "certify with the Lockheed NPAC/SMS" on 9/1/98 and that, following end-to-end testing, porting can begin on 10/1/98). See also AT&T, p. 5; GTE, p. 9 (table proposing to begin testing on 5/12/98 and complete it on 6/14/98, a total of 32 days); Pacific, pp. 19, 20 (proposing a "30 day cooperative testing period"); U S West Attachment 1, p. 5 (chart showing 30-day testing intervals).

²¹ Sprint also proposes that its "implementation will be phased in" over more than a month, but gives no rationale of any kind for such a strategy, and nowhere indicates that it actually needs that long to implement PLNP. See Sprint, p. 2.

June 11, 1998 (or 30 days after the Lockheed NPAC/SMS "live" date). BellSouth should then be prepared to complete its implementation of PLNP in Phase I no later than June 26, 1998 (or two weeks after the completion of intercompany testing).

The two-week interval AT&T proposes between testing and implementation is more than adequate to permit carriers to do any last-minute clean-ups to their own systems and processes, and to prepare themselves to accept orders for PLNP. This is especially so when one considers that "implementation" of PLNP means nothing more than being prepared to accept and fulfill orders for that service. Carriers have agreed that conversion of customers from ILNP to PLNP will be conducted on a separate timetable. Conversion should occur within 90 days following the availability of both PLNP and an operational interface to permit CLECs to order conversions from interim portability methods to PLNP.

BellSouth's petition seeks to justify its unreasonably long periods for PLNP implementation by comparing them to the intervals in which the LNP Reconsideration Order allowed carriers to phase-in PLNP. This comparison is simply inapposite. According to the express terms of the Phase I Waiver Order, carriers in the Western, Southeast, and West Coast regions should not have delayed their implementation of LNP in any respect other than those that "specifically relate to the availability of the vendor-supplied [NPAC/SMS]."²² The LNP Reconsideration Order addressed the full range of issues involved in carriers' implementation of PLNP, and established a schedule accordingly. In

²² Phase I Waiver Order, ¶ 8.

stark contrast, as the Phase I Waiver Order makes plain, the vast majority of network modifications required to implement PLNP must be completed for Phase I MSAs no later than March 31, 1998 -- more than a month before the NPAC/SMS "live" date in the affected regions.

Thus, the only aspects of LNP that have yet to be finalized are those that directly relate to carriers' ability to place "orders" for porting with the NPAC/SMS, and to download routing information from that system to local SMSs. In light of the fact that, as shown above, the Commission's Second LNP Order required the use of identical interfaces for both the Lockheed Martin and Perot NPAC/SMSs, BellSouth has long known the specifications to which it was required to build in order to interface with the NPAC/SMS for these functions. In short, once inter-company testing is complete, implementation of LNP should be a straightforward matter.

In addition, by AT&T's proposed June 26th deadline, the industry will already have gained valuable experience and knowledge from implementing Phases I and II in the other four LNP regions, as the LNP Reconsideration Order requires LNP implementation in Phase II MSAs no later than May 15, 1998. Even those carriers that do not participate in Phases I and II of LNP implementation in other regions will benefit from the experiences vendors (many of which work for more than one carrier), regulators, and other carriers will gain in working with the Lockheed NPAC/SMS, and significant knowledge transfers can be expected through industry fora such as the LLCs, as well as through informal contacts.

V. ANY WAIVER SHOULD SEEK TO PLACE CLECS IN THE SAME POSITION THEY WOULD HAVE OCCUPIED, BUT FOR BELL SOUTH'S FAILURE TO TIMELY IMPLEMENT PLNP

As an condition of any waiver granted to BellSouth that would permit that carrier to extend its Phase I PLNP implementation beyond the schedule AT&T proposes, the Commission should attempt to place CLECs as nearly as possible in the same position they would have occupied had BellSouth been prepared to implement PLNP in a timely manner, and should prevent BellSouth from profiting by its waiver. To that end, the Commission should order that any charges BellSouth imposes on CLECs for ordering ILNP or for providing that capability during the life of any waiver may not exceed the charges, if any, that BellSouth would have imposed on CLECs had it been prepared to implement PLNP in accordance with the schedule AT&T proposes.

Such a requirement would be both reasonable and equitable in light of the fact that CLECs will bear the costs of the NPAC/SMS for BellSouth's territory and other PLNP-related costs during any waiver period, and so should not be required to pay for both PLNP and ILNP during that time. In addition, BellSouth should not be permitted to charge CLECs in any way for converting from ILNP to PLNP those customers that were forced to port their numbers using interim portability methods during any period in which the LNP Reconsideration Order would have required BellSouth to make PLNP available for that customer.²³

²³ To the extent that an ILEC obtains a waiver based solely on Perot Systems' failure to provide an NPAC/SMS for its region, rather than its own problems, the above recommendations should not apply to that carrier, as the entire industry is affected

(footnote continued on next page)

VI. THE COMMISSION SHOULD USE THE INSTANT PROCEEDING TO
COMPLETE ITS ADJUSTMENT OF THE LNP TIMETABLE IN THE
AFFECTED REGIONS

AT&T urges the Commission to complete its realignment of the entire LNP schedule in this proceeding. It would be an inefficient use of the already heavily taxed resources of both the Commission's staff and carriers to conduct repeated rounds of comments on subsequent LNP Phases that inevitably would present precisely the same issues as the instant petitions. Once the Phase I schedule is adjusted, establishing a timetable for the remaining Phases is a straightforward matter.

After intercompany testing of the Lockheed NPAC/SMS is completed for Phase I MSAs in each region, there is no valid reason for that testing to be repeated in subsequent MSAs. Further, as the Phase I Waiver Order required for Phase I MSAs, carriers in the Western, Southeast, and West Coast regions should be continuing their efforts to complete all necessary modifications and upgrades in their own networks to prepare themselves to offer PLNP in subsequent Phases according to the schedule established in the LNP Reconsideration Order. Thus, after completion of Phase I, carriers approaching Phase II should need no more than two weeks to complete implementation in those MSAs -- just as they required two weeks following the completion of testing to complete Phase I. Similarly, Phase III can, and should, be completed two weeks after

(footnote continued from previous page)

by, and is without fault for, Perot's failure. However, no ILEC should be permitted to profit in any way from its own failure to make PLNP available to its CLEC competitors.

completion of Phase II. If the Commission adopts AT&T's proposal, it can return to the LNP Reconsideration Order's schedule beginning in Phase IV.

CONCLUSION

For the reasons stated above, the Commission should establish the following deadlines for Permanent Local Number Portability implementation in the Western, Southeastern and West Coast regions by all carriers:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

Respectfully submitted,

AT&T CORP.

By /s/ James H. Bolin, Jr.

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March 12, 1998

EXHIBIT 1

**LNPA Technical and Operational Requirements Task Force
Meeting Minutes 11/13-14/97
Washington, DC**

Attendees

Roger Marshall	- Ameritech	David Heath	- MCI	Via Conference Bridge
Donna Navickas	- Ameritech	Ron Rotondi	- MCI	Karen Kay - Time Warner
Bonnie Baca	- AT&T	Ken Kohl	- Nortel	Colleen Collard - Tekelec
H.L. Gowda	- AT&T	Jackie Klare	- Pacific Bell	
Beth Watkins	- AT&T	Phil Evans	- Perot Systems	
Dan Currie	- Bell Atlantic	Marilyn Murdock	- SBC	
John Malyar	- Bellcore	Dave Garner	- Sprint	
Dennis Davis	- BellSouth	Leigh Blood	- Tel Tek Solutions	
Holly Hogue	- Evolving Sys.	Lisa Marie Maxson	- Telecom Software Ent.	
Jim Rooks	- Evolving Sys.	Phil Presworsky	- TCG	
Bob Angevine	- GTE - Info. Tech.	Dan Gonos	- WinStar Comm.	
Jim Gray	- GTE - Network Sys.	Kim Wise	- WorldCom	
Karen Boyer	- Illuminet			

Bonnie opened the meeting with introductions around the room and on the conference bridge. The minutes of the previous meeting were approved as written.

Requirements

Lisa Marie distributed a handout that further clarified the NPA Split Requirements which was discussed and closed. Lisa provided another handout that clarifies the Port to Original process flows in the IIS which was also discussed and closed. Lockheed will implement these processes on 12/3. Perot will be later in the first quarter, 1998.

It was agreed that once requirements are closed, a new change order must be issued to make any further changes so as not to impact the current price quote for work in progress or under negotiation.

There were no Open Release 1 change orders for this meeting.

Release 2- See attached for the final requirements for change orders included in Release 2

It was agreed that all the Release 2 requirements must be closed at this meeting in order for the price quotes requested by the LLCs to be delivered on time. It was also noted that Release 2 requirements will not be updated to the FRS until the LLCs have completed their negotiations with the vendors and reached agreement for implementation, and therefore, have been removed from the WEB.

Each change order was discussed until agreement was reached. All agreements are reflected in the requirements documents attached.

Change Management Process Flow

All participants agreed with the new T&O/LLC process flow. David Heath agreed to bring in suggested time-frames associated with the functions included on the flow at the January T&O meeting. Updated documents will follow.

NPAC scheduled downtime

Lockheed regional Service Providers have agreed to an interim weekly scheduled downtime to accommodate network testing and SP and NPAC system maintenance. The window is scheduled early every Wednesday morning for between 3 and 6 hours depending the activities involved. Perot will look at the same window and report back.

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Illinois Status

Donna Navickas reported that Ameritech will not participate in live LNP without a cost recovery order, and have petitioned the Illinois Commerce Commission (ICC) for interim relief which, if granted, would result in portability by 11/24.

Number Pooling requirements for 847 based on Pre-port and Snapback to the block holder have been finalized. Process flows will be worked in Illinois subcommittees in Chicago next week. This is expected to be implemented for preview around January 9.

It was also requested that Number Pooling be placed on our December agenda to begin to address the recommendations of the INC.

Miscellaneous Issues

Bonnie reported on the activities of the Working Group on 11/12 and provided copies of reports distributed there including the FCC Tracking Matrix, the report of the Cincinnati Bell subcommittee on NPAC boundaries, the letter from the T&O to the LLCs regarding Release 2, and the NPAC and LNP Status Reports (see attached).

Bonnie also reported that the Working Group plans to discuss its direction and oversight of the T&O at its next meeting in order to clarify the process for introducing changes to the NPAC.

During the discussion of Release 2 requirements, some concern was expressed about the need and support for NANC 48. Consensus was to wait for the LLC reply before the T&O would discuss retraction of any Change Orders.

Bonnie also provided copies of reports presented at the 10/21 NANC meeting including Number Pooling and NANPA activities.

The CMA/CMAS process is still under discussion with the vendors and other entities to try to reach an agreeable method of contracting for this service.

Additional dates are needed to complete the NPAC System and Center Readiness Report for the Perot regions. Dennis Davis reported for the SE Region that inter-company testing is scheduled for 12/15 through 1/30 with Commercial Porting to begin on 2/2/98. Stan Spillers is the contact for the remainder of SE information. Bonnie will check with the Operations team co-chairs in the other regions for the dates.

Implementation Process for NANC Releases

John Malyar of Bellcore requested that discussion of the implementation process for NANC releases be scheduled. The members discussed briefly how to go about addressing this issue as it is a large and complex subject. It was agreed that the T&O would develop a guidelines document including recommended procedures for the testing and implementation of NANC recommended releases in order to maintain industry uniformity of LNP data base systems.

Issues include network versus operations systems, downward compatibility, supplier expectations, regression testing requirements, testbed systems versus production, network and communications, timing, flash cut versus support for prior versions, physical installation, failure processing and backup systems, and industry coordination, just to mention a few.

It was agreed to start with presentations by the NPAC vendors regarding their current processes and expectations. The suppliers would then react/respond to the issues raised by the vendors, and concerns and issues will be documented and discussed until a consensus process emerges.

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The vendor presentations will be made during the New York meeting either on 12/3 or 12/4. John Malyar agreed to investigate the possibility of someone from SMS/800 at Bellcore sharing their process with us at that meeting to identify similar circumstances and issues which may already have been addressed in the industry. Bellcore availability may dictate the presentation date. Discussions will continue at the January meeting in an effort to document our process before Release 2 is delivered.

Next Meetings

December 3 Noon-5pm

December 4 8:30-4pm

Bell Atlantic (host)

1095 Avenue of the Americas (6th Ave at 42nd St.)

New York City

January 5 Noon-5pm

January 6 8:30-4pm

(Southwestern Bell hosts)

Kansas City Airport Marriott

Kansas City, MO

816 464-2200

Rate (NANC/Southwestern Bell) \$104

Attachments

Agenda

Final Release 2 Requirements

FCC Second Report and Order Tracking Matrix

Cincinnati Bell Subcommittee Recommendation

Letter to LLC and Summary of Release 2 Change Orders

NPAC System and Center Readiness Report

Phase I LNP Implementation Status Report to the FCC

CERTIFICATE OF SERVICE

I, Terri Yannotta, do hereby certify that on this 12th day of March, 1998, a copy of the foregoing "Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached service list.

/s/ Terri Yannotta
Terri Yannotta

March 12, 1998

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